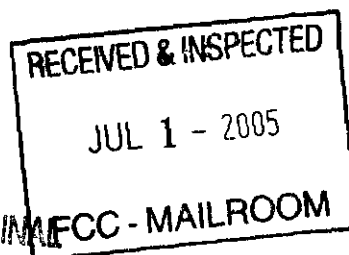




STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
OFFICE OF THE DEAF AND HARD OF HEARING

June 29, 2005



Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-B204  
Washington, DC 20554

NET FILE COPY ORIGINAL

RE: In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket 03-123.

Dear Ms. Dortch:

As mandated by the Federal Communications Commission (FCC), the Office of the Deaf and Hard of Hearing (ODHH) has reviewed documentation provided by HandsOn Video Relay Services, Inc., (HOVRS) that attests to HOVRS' compliance with FCC mandatory minimum performance standards for VRS. ODHH has also reviewed the log of HOVRS' consumer complaints that allege a violation of the federal minimum standards for Telecommunications Relay Services as applicable to VRS. ODHH finds the information satisfactory for purposes required by the FCC for filing under FCC Rule Section 64.604 and CG Docket 03-123. ODHH is providing you with a compliance report, consumer complaint log and summary to file with the FCC. Enclosed please find the annual complaint log for the State of Washington and a summary, which indicates the number of complaints, received by ODHH ending May 31, 2005.

Should you have any questions concerning this summary or report log, please contact our designated FCC contact person, Robert Lichtenberg, at (360) 902-8000 TTY/V.

Best Regards,

Robert Lichtenberg  
Washington State Relay Administrator

Enclosures:

- 1) HOVRS Certification to ODHH of Compliance with FCC Rule Section 64.604
- 2) Annual Log of Consumer Complaints for period of June 1, 2004 – May 31, 2005
- 3) Annual Summary Report for period of June 1, 2004 – May 31, 2005
- 4) 3.5 diskette with files in Word doc format

cc: Tim Brown, DSHS/HRSA  
Eric Raff, ODHH  
Robert Shirley, WUTC  
Ron Obray, HOVRS  
Dana Jackson, FCC

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Before the  
**OFFICE OF THE DEAF AND HARD OF HEARING**  
Olympia, Washington

RECEIVED & INSPECTED

JUL 1 - 2005

FCC - MAILROOM

***HANDS ON VIDEO RELAY SERVICES, INC. CERTIFICATION TO THE OFFICE OF  
DEAF AND HARD OF HEARING OF COMPLIANCE WITH FCC RULE SECTION  
64.604'S REQUIREMENTS FOR PAYMENT FROM THE INTERSTATE TRS FUND***

Hands On Video Relay Services, Inc. ("Hands On"), submits this certification of compliance with the requirements of FCC Rule Section 64.604 to receive reimbursement from the Interstate Telecommunications Relay Service ("TRS") Fund as a provider of Video Relay Services ("VRS") to the Office of the Deaf and Hard of Hearing ("ODHH") of the State of Washington.

***I. Hands On.***

Hands On is a California corporation with its headquarters at 595 Menlo Drive, Rocklin, CA 95765-3708. Hands On operates VRS call centers at the Rocklin location and in the cities of Oakland, CA., Temecula, CA, and Vancouver, WA. The ODHH is invited to tour any and all of the company's call centers.

***II. Hands On's Video Relay Service.***

Hands On provides VRS via a combination of Internet Protocol and the public switched network ("PSTN") to allow deaf, hard of hearing and speech impaired individuals to place and receive telephone calls in a manner functionally equivalent to telephone service provided hearing persons. A typical call operates as follows: a deaf or hard of hearing individual will access one of the Hands On Relay Centers via the Internet on his or her personal computer equipped with a video camera or via a video-phone device such as the Dlink 1000 video phone. In order for the video portion of the link to function properly the connection must be a high speed data line of 128 kBs or higher. The deaf or hard of hearing individual will

be connected via two-way video link with one of Hands On's Communications Assistants ("Video Interpreter" or "VI") who will communicate through American Sign Language (or a variant thereof) ("ASL") with the hearing user. The VI will then place a landline telephone call to the called party and then translate ASL to voice and vice versa to allow the parties to converse in a functionally equivalent manner to a telephone conversation between hearing persons.

Hands On has also developed the capability to allow hearing persons to place calls to deaf and hard of hearing persons. Hearing persons contact the call centers via a toll free number, provide contact information for the deaf or hard of hearing person to the VI, and are connected to the call party. Conversation then ensues just as with a deaf or hard of hearing person initiated call.

**A. *Overview of technical facilities.***

Since 2000, Hands On has been developing an affordable video technology network that will enhance the lives of the deaf and hard of hearing by delivering to their desk top, in their homes or businesses, a professional ASL trained interpreter. With the use of the Internet, video compression, hardware and software, Hands On has developed a service to take its core competency, sign language interpreting to any deaf or hard of hearing person with a PC (including both windows based PCs and Apple MacIntosh) and camera or video-phone and a high speed data line. Hand On's video network incorporates redundancy in its hardware, software and Internet provider to ensure reliable and continuous service.

**B. *High Speed Internet.***

Hands On's call centers are equipped with redundant high speed Internet lines (usually DS-3s) to facilitate multiple video calls simultaneously. These high speed Internet lines coupled with Hands On's use

of enhanced video compression, provide a design specification of 20 frames per second (FPS) or higher for video calls.

***C. Database Driven Reports/Call Tracking.***

To accurately track calls for billing, expansion and quality control, Hands On has developed a proprietary automated database software system. This software allows supervisory personnel to track calls in a variety of ways. They include:

1. Length of calls.
2. Number of calls at any given hour of the day, week or month.
3. Number of calls holding for more than 10 seconds, 30 seconds and so on.
4. Number of dropped calls.
5. Number of unanswered calls.
6. Answer speed.

The call tracking software is the key to effective and efficient resource allocation. Measured usage trends demonstrate system busy hours (and days) and thus allow for optimum coverage by the VIs. On a longer term basis the call tracking provides guidance on the necessity for system upgrades of incoming and outgoing lines, additional work station, or call center construction. Thus, Hands On's call tracking ability allows management to maintain quality service and facilitate service improvement.

***D. Call Center.***

The VRS Call Centers are designed to incorporate the latest technological advancements. Back up systems are employed to protect critical circuits. Private cubicles and recreation rooms are deployed to ensure VI retention. Each video interpreter workstation is modeled with the privacy of the customer and

the video interpreter in mind. Each workstation is configured to minimize ambient noise and to promote the privacy of the video relay call. Each workstation consists of a high-end PC computer running Windows XP Pro, capturing video at up to 30 fps. Each video camera is mounted on a flexible arm atop a height-adjustable desk with ergonomic chairs and keyboard trays to provide the ideal posture for a video interpreter. The stations utilize external LCD monitors between the sizes of 17 and 19 inches, and in some instances run a Macintosh computer in the background, sharing the same common monitor, keyboard, and mouse. Each station has battery backed up for up to 10 minutes to ensure calls are completed in the event of a power outage.

*E. Video Laboratory.*

Hands On has designed a Video Laboratory to test new technology prior to introduction into the Relay Center environment.

*III. Hands On is a qualified VRS provider.*

FCC Rule Section 64.604(c)(iii)(5)(F) sets forth eligibility criteria for receiving payments from the TRS Fund as follows:

1. TRS facilities operated under contract with and/or by certified state TRS programs pursuant to §64.605; or
2. TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to §64.604; or
3. Interstate common carriers offering TRS pursuant to §64.604.

The first category of eligible providers requires that they operate under contract with or be associated with a state TRS program certified by the FCC, §64.605 sets forth the requirements for certification. Hands On meets this requirement through its agreement with the State of Washington's TRS program. Hands On will show below that it meets the minimum unwaived standards of FCC Rule §64.604. Hands On is also a certified resale carrier in the State of California.

**A. *Hands On meets all the minimum operational and technical standards set forth in §64.604.***

Hand On meets all minimum standards specified in §64.604 that have not been waived for the provision of VRS service.

**1. *Communications Assistants ("Video Interpreters").***

Hands On's Video Interpreters have sufficient training to meet the specialized communications needs of deaf, hard of hearing, and speech impaired individuals. Hands On is in a unique position to attract and hire the best qualified interpreters in the field because for the past 13 years Hands On has been providing interpreting services for deaf and hard of hearing people living in the San Francisco Bay Area and the Sacramento Valley, and has in the past eight years expanded its presence nationwide. Hands On thus has the experience and expertise needed to attract and hire qualified interpreters to provide deaf and hard of hearing persons quality VRS.

Hands On attracts qualified video interpreters by offering an excellent benefits package, attractive salaries, and screening candidates through a well designed interviewing process. Applicants are required to hold a current certification, RID: CSC/CI, CT; or NAD level IV/V. As a result of its existing line of business of providing ASL translation services, Hands On has a natural recruitment resource for its VIs.

Currently, Hands On maintains a database of more than 600 ASL interpreters residing mostly in the State of California. Hands On draws from this base to fulfill its needs for VIs, as well as utilizing other recruitment sources.

Hands On's VRS interpreters are able to interpret effectively, accurately and impartially, both receptively and expressively, using any necessary specialized vocabulary as required by FCC Rule Section 64.604. VRS interpreter candidates for their second interview are required to submit to a skills assessment. The applicant is asked a series of questions using a video workstation similar to the one he or she would be using if hired. This type of interview allows Hands On to accurately judge the video relay skills of the interpreter being interviewed. Hands On prefers to hire individuals with at least three months of prior experience in video relay or video based interpreting.

Hands On believes that attracting and hiring qualified interpreters is only the beginning. It is dedicated to maintaining the highest level of service. To do so Hands On tries to keep employee turnover to a minimum. It believes this can best be achieved through on going training and focus on employee morale. Although continuing education is a requirement for certification, Hands On is dedicated to fostering a company philosophy that promotes continual improvement.

Initial training is provided all new employees during the first two weeks of employment. During orientation to the company, all benefits are explained in detail and necessary forms completed and signed. The employee's health and safety is a priority as such employees receive training in ergonomics and how to prevent injury. All interpreters are trained on call processes, policies and procedures as well as cultural diversity. Employees are allowed to learn and practice handling video relay calls in a safe training

environment. Once an employee has completed the initial training he or she works closely with a more experienced employee. For the first week while handling actual relay calls, the new hire will work side by side with a trained team member before handling calls on his or her own.

On going training is provided as new software releases and hardware improvements are developed and implemented. As individuals, employees, and the company continue to strive for excellence Hands On seeks out beneficial training opportunities for its employees which include professional development and deaf culture training.

Hands On also concentrates on employee morale to retain trained interpreters. Since Video Relay Interpreters work in a call center environment, VRS call centers are accessible; designed and built with a focus on safety and ergonomics. Work stations include adjustable desks, ergonomic footrests and chairs. Employees' cubicles have clear pass through panels to facilitate communication while not on calls. Due to the physical and mental demands of interpreting, employees rotate approximately every twenty minutes, subject to the rules concerning in-call replacement of VIs, with a target occupancy level of between 45 and 50 percent. VIs are given two breaks during the course of an eight hour shift, in addition to a meal break. In addition, the platform encompasses break alerts to ensure employees receive adequate rest after 20 minutes of continuous interpreting. Break rooms provide employees a place to eat, recover and be entertained, providing high speed internet access and TV. Hot wax machines are also available so employees may protect themselves from repetitive motion injuries.



2. *Confidentiality and conversation content.*

Company policy stresses that Communications Assistants are prohibited from disclosing the content of any relayed conversation regardless of content, except as authorized by Section 705 of the Communications Act. No record is kept of the contents of communications handled. Likewise company policy forbids altering a relayed conversation and requires that conversations be relayed verbatim.

3. *Types of calls.*

Hands On does not limit the type or length of calls, except where the FCC has in place a waiver allowing it to do so. The requirement to provide pay-per-call service is waived for VRS. Thus, 900 and other pay per call services are not provided due to the difficulty of billing the customer. Hands on provides long distance service for no charge to VRS callers. Types of calls for which the the FCC has granted waivers are discussed below.

*Operator assisted calls; billing for long distance calls.* Pursuant to existing waiver, VRS providers are not required to handle operator assisted calls and are not required to bill certain types of long distance calls to the end user.<sup>1</sup> See *VRS Waiver Order*, 17 FCC Rcd at 161. Hands On currently completes long distance calls at no charge to the VRS user. Moreover, incoming calls to be routed to deaf or hard of hearing persons over the Internet come to Hands On via an 800 number at no charge to the calling party. By the very nature of VRS, it is difficult for Hands On to know whether a call coming to it is local, even if IP address data are available.

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<sup>1</sup> FCC Rule Section 64.604(a)(3) requires TRS providers to complete all types of calls.

Hands On completes calls via the most affordable method where appropriate. Hands On also handles 411 information calls for its customers at no charge to them. Therefore, deaf and hard of hearing persons receive service comparable to the switched telephone network. Requiring VRS providers such as Hands On to handle all operator assisted calls and to bill long distance calls to its deaf or hard of hearing users is problematic. Hands On does not have the billing mechanism for these calls. Nor pursuant to the FCC's existing interpretation of what are reasonable costs, does Hands On have the resources to devote to development of the billing mechanism. Completion of operator assisted calls and billing for long distance calls is technically possible, but only through credit card billing, and as the FCC has acknowledged, using calling cards is not a viable alternative. *VRS Waiver Order*, 17 FCC Rcd at 161. Moreover, at present the Hands On platform is not set up to accept credit card billing. To do so would again require research and development efforts to design software modifications which would tax its already overextended engineering staff.

*Equal access to interexchange carriers.* Waiver of the equal access to interexchange carrier requirement has been granted for several reasons. First, since the deaf to VI portion of a VRS call is carried over the Internet, the VRS provider does not necessarily know the interexchange carrier of choice of the consumer since the consumer's identity may not in fact be known.<sup>2</sup> Second, choice of carrier is not critical in the VRS context since the deaf or hard of hearing consumer is not paying for call completion. Third, with VRS still in its infancy, requiring VRS providers to route calls over a host of different interexchange carriers would serve to unnecessarily increase the costs of providing VRS service even if it

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<sup>2</sup> There is no requirement for registration of VRS customers and any such requirement would raise privacy concerns.

were possible to charge actual long distance costs to the deaf or hard of hearing customers. Fourth, because a VRS provider may be located in another state from the deaf or hard of hearing consumer, what may be a local call for the deaf or hard of hearing person is likely to be a toll call for the VRS provider. Thus, the Commission concluded that implementing carrier of choice for VRS is likely to lead to confusion, increased complaints and unnecessary costs, without serving any appreciable public interest objective.

*900 number services.* The FCC has waived the requirement for handling pay-per-call services, *see* FCC Rule Section 64.604(b)(6), due to the expected low demand for these types of calls and the burden this requirement would impose on startup VRS providers. *VRS Waiver Order*, 17 FCC Rcd at 164. That waiver was recently extended to IP Relay providers at the request of Sprint. Sprint sought waiver on the ground that 900 service providers require the ANI of the calling party. The ANI obviously cannot be provided in an IP Relay context for the same reason it cannot be provided for emergency call handling.

*Call release.* Call release is also waived for VRS. Call release would allow two VRS users to converse with one another after Hands On has set up the call. Two VRS users can now talk to one another without VRS if they have video conferencing software which is compatible with one another. For Hands On to feature this service would require research and development in a number of areas. The platform's video software would have to be modified to provide a second window so the video interpreter could sign to more than one person at a time. In addition, a means of translating incompatible video conferencing formats would have to be achieved. In addition, at least one VRS provider blocks its proprietary hardware and software to prevent its VRS users from accessing other VRS providers, so legal and technical means would have to be found to defeat this blocking in order to provide universal access.

*Three-way calling.* The requirement to offer three-way calling is currently waived as well. Three-way calling is currently possible from one VRS user to two or more hearing users through conference calling using the public switched telephone network. Three-way calling among two VRS users and one or more hearing users is not possible without additional research and development and the addition to the VRS platform of certain additional hardware. Hands On estimates the additional cost of the research and development and hardware would be approximately \$750,000. In addition to the modification to the platform video software discussed above, users would need to have available video conferencing software with multiple video windows so that two VRS users could see each other as well as the interpreter. Other platform related research and development efforts would need to be made.

Hands On has experience conducting audio conference calls set up over a conference bridge where each deaf person calls in using a separate VI. In Hands On's view that is a much more manageable situation at this point. Hands On is fully capable of offering that service.

*Speed dialing.* Hands On offers speed dialing through the personal phonebook feature on its platform. It therefore needs no waiver of this requirement.

*VCO-to-TTY, HCO-to-TTY, VCO-to-VCO and HCO-HCO.* Each of these types of calls are waived for VRS. VCO to TTY and HCO to TTY require the video interpreter to video interpret to a deaf, hard of hearing or speech impaired individual and simultaneously operate a keyboard to interpret to the TTY user. Though technically possible with certain modifications to Hands On's platform, such a call requires the VI to conduct two hand intensive interpretations. The VI cannot sign and type at the same time. Hands On questions the utility of such calls since they will be disjointed due to the time necessary to conduct separate transliterations using sign language and TTY. Moreover, the likelihood of confusion on

the part of VIs is substantial. Such calls are likely to cause strain and fatigue to a VI. A better means of doing such a call -- to the extent there is any demand for them -- is for the VI to place the call to a text relay service so that the text relay operator can handle the TTY side of the call and the VI can handle the VRS side of the call. Informal discussion with the FCC staff has indicated at least some question whether such a call is a compensable relay call, however. Thus, FCC clarification of this requirement is necessary in the VRS context.

VCO to VCO and HCO to HCO calls may have some of the similar problems if TTYs are used for one side of the conversation. The VI can interpret to the VRS user who is using VCO, but will likely have difficulty typing the incoming voice message from VCO TTY user. Similarly, with HCO to HCO, the interpreter must concurrently read the signing of the VRS user and read the incoming text of the TTY user. The interpreter cannot therefore pay attention to both ends of the conversation and is likely to miss significant portions of the conversation. VCO to VCO and HCO to HCO VRS calls could be done with video conferencing software modifications similar to those discussed concerning three-way calling. If the FCC were to conclude that the reasonable costs of providing relay included research and development to meet waived standard, these software modifications could be undertaken.

#### **4. *Emergency calls.***

The Commission has waived for VRS and Internet Protocol traffic the requirement for immediate routing of calls to the nearest Public Safety Answering Point ("PSAP"), and the passing of the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services. However, when such service is technically feasible for VRS and Internet Protocol, Hands On commits to

implement such service. Hands On makes it clear on its web site and on its promotional materials the shortcomings and potential dangers of using VRS to place an emergency call using 911.

**5. *In-call replacement of Communications Assistants.***

Hands On's VIs stay with a call for at least 10 minutes before being replaced by another VI.

**6. *Gender Preference.***

Hands On uses its best efforts to accommodate a VRS user's requested Communications Assistant's gender when a call is initiated and, if a transfer occurs, when the call is transferred to another Communications Assistant.

**7. *ASCII and Baudot.***

The requirement of capability to communicate with ASCII and Baudot is inapplicable for VRS.

**8. *Speed of answer.***

The speed of answer requirement of §64.604 is waived for VRS. However, it is Hands On's goal to provide rapid answer performance, consistent with available funding. Currently, Hands On's answer performance averages under 30 seconds. Hands On has requested the FCC to set a functionally equivalent speed of answer standard at the earliest possible time.

**9. *Equal access to interexchange carriers.***

The equal access requirement of §64.604 is waived for VRS. Hands On provides long distance (inter-exchange) service at no charge to its users.

**10. *Hands On's Operational Schedule Comports with the Rules.***

Under the rules, non-mandated services, such as VRS are not required to maintain 24 hour seven day a week operations. FCC Rule §64.604(b)(4). However, it is Hands On's intent to provide 24/7 operation as soon as economically possible. Hands On recently announced an expansion of its service hours. Hands On operates with redundant features to ensure reliable service equivalent to a local exchange carrier's central office. Hands On provides service in real time and maintains adequate facilities so that under projected calling volume the probability of a busy response due to network congestion will be functionally equivalent to that experienced by a voice caller over the non-TRS telephone network.

**11. *Voice mail and interactive menus.***

Hands On's VIs alert deaf and hard of hearing callers to the presence of a recorded message and interactive menus. Other requirements relating to voice mail and interactive menus has been waived or are otherwise inapplicable to VRS. Hands On has asked the FCC to allow the functional equivalent of voice mail, video mail, for deaf persons. A ruling on that request is pending.

**12. *Complaints.***

Hands On maintains a log of consumer complaints including all complaints concerning its VRS service or concerning TRS service in general. The log includes the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. Summaries of logs indicating the number of complaints received for the 12-month period ending May 31 will be submitted to the FCC by July 1 annually. A copy of the log shall be submitted to the ODHH.

**13. Contact person.**

The contact person for Hands On for VRS consumer information and complaints about Hands On's service is Ronald E. Obray, 595 Menlo Drive, Rocklin, CA, telephone 800-900-9478 (voice), 800-900-9477 (TTY), email [robroy@hovrs.com](mailto:robroy@hovrs.com).

**14. Public access to information.**

Hands On makes an ongoing efforts to educate the public concerning all forms of TRS. This is done in billing inserts, any directories published, in advertising, on Hands On's web site, and in other available media of communication.

**15. Rates.**

Users of Hands On's VRS service pay no greater rates than paid for functionally equivalent voice communications services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination and point of termination. At this time, Hands On's VRS is free to the end user.

**B. Annual Summary of Complaints.**

Attached herewith in accordance with FCC Rule Section 64.604 is Hands On's complaint log for the period of June 1, 2004 to May 31, 2005 and a summary of complaints.

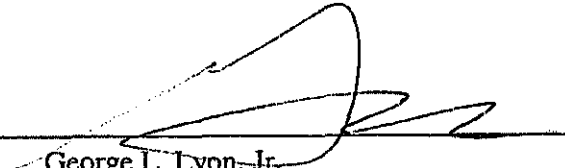


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Respectfully submitted,

**HANDS ON VIDEO RELAY SERVICES, INC.**

By



George L. Lyon, Jr.  
Its Counsel

Lukas, Nace, Gutierrez & Sachs, Chartered  
1650 Tysons Blvd, Suite 1500  
McLean, Virginia 22102  
(703) 584-8664

June 23, 2005

**Hands On Video Relay Service (HOVRS)**  
**Customer Care Summary**  
June 2004 to May 2005

SERVICE COMPLAINTS	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	April	May	TOTAL	%
Rude/attitude/ manner	0	1	1	1	0	0	0	0	0	0	0	1	4	9%
Didn't explain/ Intro VRS	0	0	0	0	0	0	0	0	1	0	0	0	1	2%
VCO/HCO procedures not followed	0	0	0	0	0	1	0	0	0	0	0	0	1	2%
Poor signing	2	0	0	1	0	0	1	1	0	0	0	0	5	11%
Poor voice tone	0	0	0	0	1	0	0	0	0	0	0	0	1	2%
Poor facial expression	0	0	1	0	0	0	0	0	0	0	0	0	1	2%
VI controlled call	0	1	1	0	0	0	0	1	0	0	0	0	3	7%
VI didn't relay everything	0	0	0	1	0	0	1	0	1	0	0	0	3	7%
VI didn't follow instructions	0	0	0	0	0	0	0	0	0	1	0	0	1	2%
Not able to understand customer	0	0	0	0	0	0	0	0	1	0	0	0	1	2%
Inappropriate VI switch	0	2	0	0	0	0	0	0	0	0	0	0	2	4%
Violated Customer Confidentiality	0	0	1	0	0	0	0	0	0	0	0	0	1	2%
Other Complaints	0	0	0	0	0	0	1	0	0	0	0	1	2	4%
Video Quality	0	1	0	2	0	0	1	0	1	0	0	2	7	16%
ASA	2	3	1	1	0	0	0	1	0	0	0	0	8	18%
Bi Lingual services	0	0	0	0	0	0	2	0	0	1	0	1	4	9%
<b>TOTAL</b>	<b>4</b>	<b>8</b>	<b>5</b>	<b>6</b>	<b>1</b>	<b>1</b>	<b>6</b>	<b>3</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>5</b>	<b>45</b>	

# HANDS ON VIDEO RELAY SERVICES

## Customer Care Log

June 1, 2004 to May 31, 2005

**Ticket:** 3134

**Ticket Opened:** 06/07/04

**Customer Comments:** I d like to share my concerns about one of these interpreters. I was very disappointed with the interpreter who did not repair her errors. I wish she could check her phone number that she typed --My facial expression showed very confused without sign language. Why did she interpret my facial expression? I did not feel very comfortable for the hearing interpreter to interpret my facial expression without my sign language.

**Resolution:** Customer Care sent an email to customer asking them to capture VI number next time a problem happens.

**Ticket Closed:** 06/14/04

**Ticket:** 3218

**Ticket Opened:** 06/17/04

**Customer Comments:** VI 445 Almost every time I called, I spell out my telephone numbers to the interpreter, She gets wrong numbers!

**Resolution:** VI was provided feedback into their receptive signing skills and encouraged VI to ask customer if information given is not clear, to ask for clarification.

**Ticket Closed:** 06/21/04

**Ticket** 3237

**Ticket Opened:** 06/21/04

**Customer Comments:** Customer expressed outrage that he had to wait a long time before call was answered.

**Resolution:** Call Center was experiencing a high volume of calls during the time of the customers call.

**Ticket Closed:** 07/01/04

**Ticket** 3263

**Ticket Opened:** 06/28/04

**Customer Comments:** what happen VRS not work open line VRS deaf I am remember said open and not open line it not work please check your office please open line VRS.

**Resolution:** Call center did not experience high traffic volume and Call center ASA was within goal.

**Ticket Closed:** 07/19/04

**Ticket** 3289

**Ticket Opened:** 07/02/04

**Customer Comments:** I made a call about 10:45 pm, but no respond me. I wonder if Video Interpreters don't work at shift 3? Let me know what happen.

**Resolution:** Call Center was fully operational and ASA was within goal.

**Ticket Closed:** 07/19/04

**Ticket:** 3333

**Ticket Opened:** 07/08/04

**Customer Comments:** VI #287 told caller that it was time to switch interpreters. The VI put the hearing person on hold during the switch. The caller felt it was an inappropriate switch in that the VI took too long to switch and left the chair empty while the hearing person was holding.

**Resolution:** Both VI were re- trained on how to switch during a live call.

**Ticket Closed:** 07/19/04

**Ticket: 3330**

**Ticket Opened: 07/08/04**

**Customer Comments:** Caller said that he asked for a switch with VI #201 and she seemed to have a bad attitude and said, "What...I just sat down...You want to switch?" The caller informed Supervisor #120 that the reason he asked for a switch is because the VI was wearing a red shirt and it caused her to look dark and green. I didn't want to struggle to see the VI.

**Resolution:** VI was approached and counseled on communication skills and etiquette with customers.

**Ticket Closed: 07/19/04**

**Ticket 3374**

**Ticket Opened: 07/15/04**

**Customer Comments:** I want telling you the truth. I try through the interpreter and then I am waiting for the interpreter for a long time. I don't want what happen. So please you help me. I need talk with my friend.

**Resolution:** Call center was experiencing a high volume of calls during the time of the customers call.

**Ticket: 3393**

**Ticket Opened: 07/21/04**

**Customer Comments:** I was NOT pleased with Vi #271 at all, She broke the rules of interpreting, how?? she assumed who I was and told the caller who i was and telling them my name and stuff without ME SIGNING it at all , I was not happy when the Vi told my name without my permissions and assuming the role themselves

**Resolution:** VI was counseled and provided feedback that the messaged signed by the caller should only be translated, not information about the caller.

**Ticket Closed: 07/29/04**

**Ticket 3444**

**Ticket Opened: 07/23/04**

**Customer Comments:** Hello I am deaf.. I cant see the video interpreter and can't see me clear more than typing the messages...

**Resolution:** Workstation computer and network was tested and determined to be working properly.

**Ticket Closed: 07/26/04**

**Ticket: 3451**

**Ticket Opened: 07/26/04**

**Customer Comments:** Caller reports that VI289 was "rude and snotty and rolled eyes when asked to slow down." Caller asked VI to sign a bit slower and VI replied "sir, I have to sign what hearing person says." Huffed and rolled eyes. Caller is somewhat "hard of seeing" and has had not other problems with VI's signing a bit slower and larger.

**Resolution:** VI was provided feedback from customer and informed that the VI that the customers' emotions should be communicated to the person on the other line.

**Ticket Closed: 08/11/04**

**Ticket 3440**

**Ticket Opened: 07/26/04**

**Customer Comments:** Customer complained they had to wait for a long duration of time before their call was answered by a video interpreter. Customer expressed frustration regarding the long wait time.

**Resolution:** A high volume of calls were made during the time of customers call.

**Ticket Closed: 07/26/04**

**Ticket 3515**

**Ticket Opened: 08/04/04**

**Customer Comments:** Customer complained that it was unacceptable to have to wait over three minutes for a video interpreter to answer her call.

**Resolution:** The customer called during a peak time and was experienced delays in having a video interpreter answer the call.

**Ticket Closed:** 08/13/04

**Ticket:** 3551

**Ticket Opened:** 08/10/04

**Customer Comments:** Caller indicated that VI # 203 was extremely rude when the call didn't go through she kept repeatedly signing "the phone # is disconnected" over and over again. The caller tried to tell her just hang up. He then asked for a VI switch. Caller said they did not appreciate VI #203's attitude at all.

**Resolution:** VI was approached and counseled on communication skills and etiquette with customers.

**Ticket Closed:** 08/11/04

**Ticket:** 3551

**Ticket Opened:** 08/13/04

**Customer Comments:** VI #416 did not do a good job - a really bad job enough for me to go here and type my concern. No facial expressions and her finger spelling were bad too hard to read her spelling, didn't look friendly

**Resolution:** VI was approached and counseled on communication skills and etiquette with customers.

**Ticket Closed:** 08/13/04

**Ticket:** 3613

**Ticket Opened:** 08/19/04

**Customer Comments:** I had a bad experience with agent blonde, thin, older, said she supervisor. She would not let me interrupt on call and put hand up and control. She tell me to wait and not say what I sign when I interrupt. Then she wink and smile at me. Why? She does not know me! I was frustrated and mad and she keeps putting up hand and say wait. I was not satisfied. I called back later and nice agent #186 did good job, right way. I interrupt, I say what I want and then hang up fine.

**Resolution:** VI was provided feedback from customer and counseled on options to address the issue at hand.

**Ticket Closed:** 08/27/04

**Ticket:** 3650

**Ticket Opened:** 08/23/04

**Customer Comments:** Customer complained that VI#235 was using sidekick when caller came on screen. Caller had to get VI's attention. VI said "oh...sorry...smile...was talking to sweetheart.

**Resolution:** VI was informed that this is a direct violation of company and FCC policy. Internal steps and course of action were taken.

**Ticket Closed:** 08/31/04

**Ticket:** 3754

**Ticket Opened:** 09/01/04

**Customer Comments:** Caller reports that her VI appears blurry.

**Resolution:** Call center network and VI workstation was working normal.

**Ticket Closed:** 09/14/04

**Ticket:** 3802

**Ticket Opened:** 09/07/04

**Customer Comments:** VI number 157 was showing no patience as I asked her to repeat what time the place opens and close. She made her facial expression like SIGH and told me she already told me already. Her attitude and patience needs to be monitored.

**Resolution:** Coached VI on the importance of maintaining posture and professionalism time of during call.  
**Ticket Closed:** 09/23/04

**Ticket 3789**

**Ticket Opened:** 09/07/04

**Customer Comments:** Customer informed video interpreter that she is angry that she had to wait over five minutes for a video interpreter to answer her call. She demanded an answer to why it took so long.

**Resolution:** Call center at the time of call was experiencing calls in the queue.

**Ticket Closed:** 09/09/04

**Ticket: 3826**

**Ticket Opened:** 09/09/04

**Customer Comments:** I am not pleased with vi#433 at all, The end user has emailed me saying she was terrible interpreter and I agreed with them because She had a very low confidence and kept unsure of what i said and was very slow...she kept asking me to repeat etc. On the end user her voice sounds very confused and very unsure of herself causing total confusion on the end user so she had to email to clarify what we talked about.

**Resolution:** VI was approached by supervisor and it was determined that procedures were followed.

**Ticket Closed:** 09/15/04

**Ticket 3862**

**Ticket Opened:** 09/14/04

**Customer Comments:** it have problem with blurry interpreter i cant see interpreter are blurry

**Resolution:** Call center determined workstation and network was working properly.

**Ticket Closed:** 09/21/04

**Ticket: 3873**

**Ticket Opened:** 09/14/04

**Customer Comments:** Now, the VI #433 Female. She was assuming the conversation topic and 'terped the subject way off the point. She realized that she misunderstood my spelling. I was stating that my wife expressing her concerns on my dad in law's well-being. During this call, I had to repeat my simple spelling words and she didn't really get what I was saying and relayed the wordings to my dad in law totally different.

**Resolution:** VI was provided feedback into their receptive signing skills and encouraged VI to ask customer if information given is not clear, to ask for clarification.

**Ticket Closed:** 09/15/04

**Ticket: 4235**

**Ticket Opened:** 10/31/04

**Customer Comments:** "Interpreter 266 does not match my caller's emotions. The interpreter is too serious looking while my hearing caller is joking with me and I have to keep asking my friend if she is mad."

**Resolution:** VI was coached and encouraged to balance expressive and verbal signing with customers.

**Ticket Closed:** 11/02/04

**Ticket: 4351**

**Ticket Opened:** 11/15/04

**Customer Comments:** Claim against VI # 157. Customer complained that VI interrupted VIC caller and told hearing caller that hearing people can't call into the call center. Customer was very upset and explained to the VI that he has done this before and it is possible to have hearing people call in on VIC. Customer already had HOVRS VIC 877-467-4877. Customer thinks VI was not trained in VIC. Customer told Customer Service Dept he would like apology from VI or call center manager.

**Resolution:** VI was counseled that it is not their role to explain VRS services to person on voice line.

**Ticket Closed:** 11/18/04

**Ticket 4440**

**Ticket Opened:** 12/02/04

**Company:** HOVRS/HOSLS

**Customer Comments:** hello, I file to complain, want a person who can read our ASL and speak translation to Spanish with hearing people. Please we want Spanish Translation on this HOVRS. Because all my family speak Spanish. I hope get those soon.

**Resolution:** HOVRS does not provide Spanish translation. Services are not funded.

**Ticket Closed:** 12/03/04

**Ticket 4511**

**Ticket Opened:** 12/14/04

**Customer Comments:** Caller said that is problem when they use HOVRS that she had to wait long time and she did not experience this with other VRS and not problem with other services.

**Resolution:** Call center had calls in the queue that were waiting for answers longer than normal.

**Ticket Closed:** 12/16/04

**Ticket 4527**

**Ticket Opened:** 12/15/04

**Customer Comments:** Customer inquired and expressed frustration about being able to request a Spanish interpreter to assist her with a call to a Spanish speaking friend.

**Resolution:** HOVRS does not provide Spanish translation services.

**Ticket Closed:** 12/17/04

**Ticket: 4559**

**Ticket Opened:** 12/20/04

**Customer Comments:** The terp #408 performed poorly. She assumed what I wanted to call for, she didn't even bother to tell me what I need to know on menu-prompts. She just wanted to wait until the live-operator to assist our call. It is the way the terp taking over my call as I didn't grant her the permission to do so. I just requested a terp switch and got the call through. Just wanted to say, I didn't appreciate the work by Terp #408.

**Resolution:** Supervisor informed VI that they are required to translate verbatim what the voice recording says.

**Ticket Closed:** 01/03/05

**Ticket: 4583**

**Ticket Opened:** 12/23/04

**Customer Comments:** Vi#209 was wearing Big gold earrings on both ears and was very distracting when she moves her head, I had asked her to please remove the earrings, and she refused and said she don't move that much and tried to cover her hair around it.

**Resolution:** Supervisor met with VI and was informed not to wear large size jewelry.

**Ticket Closed:** 01/06/05

**Ticket: 4579**

**Ticket Opened:** 12/23/04

**Customer Comments:** Customer complained that VI #102 did not know a sign (Thanksgiving), and did not ask for clarification of the sign. Also, the caller did not feel like he could "click" with the interpreter call was not smooth maybe just not a good match.

**Resolution:** VI was provided feedback into their receptive signing skills and encouraged VI to ask customer if information given is not clear, to ask for clarification.

**Ticket Closed:** 01/05/05

**Ticket 4634**

**Ticket Opened:** 01/03/05

**Customer Comments:** I let you know I connected up the service and wait and wait and wait for about a hour later and an Video Interpreter to answer. I am requesting, to answer immediately. Or improve answering the Video Relay Service.

**Resolution:** Call center was not experiencing high volume of calls during the day and network and workstations were working properly.

**Ticket Closed:** 01/04/05

**Ticket:** 4659

**Ticket Opened:** 01/07/05

**Customer Comments:** "VI 277 did not do what I asked her. She was seated where it was hard for me to see her. I asked her to move her chair or the camera so i could see her better. She told me 'no' and said she was comfortable where she was. I was upset and hung up and called back to talk to a supervisor."

**Resolution:** Supervisor approached VI and informed that they are required to be in full view for the customer and to adhere to customer visual request.

**Ticket Closed:** 01/25/05

**Ticket:** 4708

**Ticket Opened:** 01/19/05

**Customer Comments:** Around 3 pm, Terp 455 (I am not sure if that was the right number) was assigned to work on the calls I was making, but to my dismay, she used a few "SEE" sign language and got me misunderstood several times. After I made a request to change the terp, the terp #305 (I think & she is the leading terp at the site at this hour) came and terp'ed my call all over again. Wow, I actually misunderstood the menu options with terp 455. I did ask terp 305 to report the problem I experienced with the terp 455. The question is... how can Hands On have her if she uses SEE sign language on ASL??

**Resolution:** Supervisor met with VI regarding this issue and encouraged VI to adjust signing style to insure that customers understand them.

**Ticket Closed:** 01/19/05

**Ticket 4791**

**Ticket Opened:** 02/02/05

**Customer Comments:** Customer complains that VI is blurry.

**Resolution:** Supervisor assessed the workstation and determined it was working properly.

**Ticket Closed:** 02/02/05

**Ticket:** 4887

**Ticket Opened:** 02/15/05

**Customer Comments:** Caller, "The VI did not follow my instructions. They wasted my time by introducing HOVRS and then asking for 'bob'. When the VI first came on I said ask for 'Bob'. Period! VI 186 does not follow my instructions. Some of your VIs do and some do not follow my orders.

**Resolution:** Supervisor reviewed situation with VI and determined that VI followed procedures.

**Ticket Closed:** 02/17/05

**Ticket:** 4946

**Ticket Opened:** 02/24/05

**Customer Comments:** VI #420 is very disappointing interpreter. He had a hard time with #420. Even his brother told him that she was the worst interpreter he ever had on VRS.

**Resolution:** VI met with supervisor regarding signing skills. VI was encouraged to participate in RID



development courses and training.

**Ticket Closed:** 03/02/05

**Ticket:** 4953

**Ticket Opened:** 02/25/05

**Customer Comments:** VI 157 answered a call, and the caller signed "read what I wrote and get me live person". VI processed the call and interpreted the phone tree, which stated the business was closed. The caller blamed the VI. The VI felt the signing style was very abusive towards her.

**Resolution:** VI met with supervisor and both determined that procedures were appropriately followed.

**Ticket Closed:** 03/02/05

**Ticket:** 5003

**Ticket Opened:** 03/07/05

**Customer Comments:** VI 410 (F) -- she doesn't know what she is doing??? I wasn't able to see her, and I hang up and hoping that she would call me!! She hung up and left the chat box! I didn't make any calls! Next time she should ask me.

**Resolution:** Supervisor met with VI regarding this case and determined that procedures were appropriately followed.

**Ticket Closed:** 03/07/05

**Ticket** 5085

**Ticket Opened:** 03/30/05

**Customer Comments:** Customer had question about Spanish and demanded to know why HOVRS does not provide Spanish services.

**Resolution:** Hands On does not provide Spanish interpreting services.

**Ticket Closed:** 03/30/05

**Ticket:** 5233

**Ticket Opened:** 05/06/05

**Customer Comments:** Customer said that VI #460 did not accept customer's suggestion on proper signing such as the phone ringing sign. VI refused to accept suggestion and said that she prefers her way.

**Resolution:** VI was counseled on the importance of maintaining posture and professionalism when input is provided by customer. Encouraged VI to respond that input is valued and will be considered.

**Ticket Closed:** 05/11/05

**Ticket** 5256

**Ticket Opened:** 05/17/05

**Customer Comments:** Caller complaining that Dlink is choppy and slow. I see caller with moderate breakup, but caller is understandable.

**Resolution:** Call center supervisor tested the workstation for internet connection and video quality and determined the station to be working.

**Ticket Closed:** 05/17/05

**Ticket** 5264

**Ticket Opened:** 05/17/05

**Customer Comments:** Hello! I am complaining about the vrs don't have Spanish agent so, you know that I need to communication with my family cuz they speak SPANISH ONLY! How can I communication with them that's NOT FAIR! I NEED TO KNOW ABOUT THEM... PLEASE suggestion for speak SPANISH TO SPANISH OR SPEAK SPANISH TO ENGLISH...

**Resolution:** HOVRS does not provide Spanish translation due to funding of service.

**Ticket Closed:** 05/17/05

**Ticket 5272**

**Ticket Opened: 05/20/05**

**Customer Comments:** Customer complained that they could not see video and that the video interpreter was moving too slow and choppy.

**Resolution:** Video Station was working properly and network was tested and determined to be in working properly.

**Ticket Closed: 05/20/05**

**Ticket: 5271**

**Ticket Opened: 05/20/05**

**Customer Comments:** VI#280 and 155. Started with VI #280, caller told VI to hold clearly. VI 280 though caller called her, "bitch". Caller said that it did not say that. Caller clearly said "Hold". Wanted to switch VI and VI refused but then switched to 155 and 155 had rude attitude manner with caller.

**Resolution:** VI's were counseled to call supervisor if interaction between caller and VI escalates.

**Ticket Closed: 05/23/05**

DOCKET NO. 03-123

Attachment A

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